

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION
BUREAU, et al.

Plaintiffs,

vs.

STRAFTS, LLC f/k/a STRATEGIC
FINANCIAL SOLUTIONS, LLC, et al.

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.

Case No. 24-cv-00040-EAW-MJR

**DECLARATION OF ALEXANDER D. WALL IN SUPPORT OF RECEIVER'S
EMERGENCY MOTION FOR AN ORDER TO SHOW CAUSE WHY
RECEIVERSHIP DEFENDANT LIT DEF STRATEGIES, LLC
AND INDIVIDUAL DEFENDANT JASON BLUST
SHOULD NOT BE HELD IN CIVIL CONTEMPT**

I, Alexander D. Wall, hereby declare as follows:

1. I am counsel to Thomas W. McNamara, the Court-appointed temporary receiver (the "Receiver"), in the above-captioned action. I have personal knowledge of the facts set forth in this Declaration and if called as a witness, I could and would competently testify to the facts stated herein.

2. I submit this Declaration in connection with the Receiver's Emergency Motion for an Order to Show Cause Why Receivership Defendant Lit Def Strategies, LLC and Individual Defendant Jason Blust Should Not Be Held in Civil Contempt.

3. On February 24, 2024, I accessed the website of the Nevada Secretary of State and downloaded a copy of the Business Information Page for Fidelis Legal Support Services,

LLC (“Fidelis”). Attached hereto as Exhibit 1 is a true and correct copy of a printout from the Nevada Secretary of State’s Business Information Page for Fidelis.

4. On February 25, 2024, the Receiver’s staff accessed the website of Fidelis and downloaded a copy of Fidelis’ website. Attached hereto as Exhibit 2 is a true and correct copy of a printout of Fidelis’s website.

5. On February 25, 2024, the Receiver’s staff accessed the website of Defendant Lit Def Strategies, LLC (“Lit Def”) and downloaded a copy of Lit Def’s website. Attached hereto as Exhibit 3 is a true and correct copy of a printout of Lit Def’s website.

6. I have reviewed StratFS Salesforce client records for emails to and from the “Fidelissupport.com” email domain, and I have located various emails to and from email addresses using the “Fidelissupport.com” domain going back to at least February 2022. Attached hereto as Exhibit 4 is a true and correct copy of a sample of Fidelis emails that were located in the StratFS Salesforce environment.

7. Attached hereto as Exhibit 5 is a true and correct copy of an October 26-27, 2021 email string regarding Fidelis.

8. Attached hereto as Exhibit 6 is a true and correct copy of an October 28-29, 2021 email string concerning Fidelis invoicing.

9. Attached hereto as Exhibit 7 is a true and correct copy of the October 28 – November 30, 2021 email string regarding Fidelis invoicing.

10. Attached hereto as Exhibit 8 is a true and correct copy of a March 8-24, 2022 email string concerning Fidelis invoicing along with a related contract.

11. I have reviewed StratFS Salesforce client records for emails to and from the “Litdefstrategies.com” email domain, and I have located various emails to and from email

addresses using the “Litdefstrategies.com” domain. Attached hereto as Exhibit 9 is a true and correct copy of a sample of pre-February 2022 Lit Def emails that were located in the StratFS SalesForce environment.

12. Attached hereto as Exhibit 10 is a true and correct copy of a sample of post-February 2022 Lit Def emails that were located in the StratFS SalesForce environment.

13. I have also specifically reviewed StratFS SalesForce client records for emails to and from the “Litdefstrategies.com” and “Fidelissupport.com” email domains since the imposition of the TRO on January 11, 2024. Attached hereto as Exhibit 11 is a true and correct copy of a January 31, 2024 email string located in the StratFS SalesForce environment.

14. The Receiver is also in possession of a January 31, 2024 email string from StratFS’s servers having a subject line including the description “File #116026404.” Attached hereto as Exhibit 12 is a true and correct copy of this January 31, 2024 email string.

15. The Receiver is also in possession of a January 22, 2024 email from StratFS’s servers sent by a Senior Vice President of StratFS. Attached hereto as Exhibit 13 is a true and correct copy of the January 22, 2024 email.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 26th day of February, 2024, in San Diego, California.

/s/ Alexander D. Wall
Alexander D. Wall